

Attorney Docket No. NVID001/00US
Application Serial No.: 09/056,656

REMARKS

By the foregoing amendments, Applicants have amended claims 100, 105, and 111, and cancelled claims 101-103, 109, 110, and 112. Thus, claims 100, 104 - 108, and 111 are pending in the application. Applicants respectfully request consideration of all pending claims in view of the foregoing amendments and the following remarks.

Interview Held May 14, 2003

Applicants express appreciation for the personal interview between the Examiner and Applicant's representative where cited art and proposed amendments to claims 100 and 111 were discussed.

The Rejections under 35 U.S.C. § 112, first paragraph, Are Accommodated or Rendered Moot

The Office Action rejects claims 100 - 102 under 35 U.S.C. § 112, first paragraph, for reciting "said replacement policy determination operates such that a common priority scheme is applied to a plurality of cache lines containing texels." Office Action, item 3, at page 2. By amendment, Applicants have deleted the referenced language from claim 100. Applicants have also cancelled claims 101 and 102, rendering the rejection as to those claims moot.

Withdrawal of the rejection under 35 U.S.C. § 112, first paragraph is respectfully requested.

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The Rejections Under 35 U.S.C. §103 Are Accommodated or Rendered Moot

The Office Action rejects claims 100 – 103, 111 and 112 under 35 U.S.C. § 103. Office Action, items 4 – 15, at pages 2 - 6. Applicants respectfully traverse the rejections for the reason that the cited references, even if combined, fail to disclose all recited features.

With respect to claim 100, applicants respectfully submit that the cache tag blocks 1010 and 1015 of Rivard can be distinguished from the bit flags recited in claim 100 for at least the reason that cache tag blocks are described in Rivard as including Least Recently Used (LRU) Engine and Content Addressable Memories (CAM's). See Fig 12, and column 7, lines 30-44 of Rivard. Such disclosure goes beyond the feature of the claimed bit flag.

In addition, claim 100, as amended, recites "a first set of flags and a second set of flags, each of the first set of flags and the second set of flags having a bit position for each of a plurality of cache lines in the cache memory." By contrast, Rivard's cache blocks provide one set of tags for high resolution (cache block 1010) and another set of tags for low resolution (cache block 1015). See Fig 10 and column 6, lines 22-41 of Rivard. In other words, Rivard only discloses a single tag per address bit. *Id.* Applicants respectfully that the amended features in claim 100 do not include new matter since they are disclosed in the specification at page 19, line 12, to page 20, line 19.

Applicants have cancelled claims 101 – 103 for the sole purpose of advancing prosecution in this case, and reserve the right to argue the merits of those claims in future prosecution. Such cancellation renders the rejection as to those claims moot.

With regard to claims 111 and 112, Applicants first note that, by amendment, claim 112 has been cancelled, and features of claim 112 have been included in claim 111. Thus, the rejection as to claim 112 is rendered moot. With further regard to claim 111, Applicants respectfully submit that the references, even when combined, fail to disclose at least the feature of "page table entries in the local memory," as recited in amended claim 111. Even the Office Action recognizes that, at best, Gannett discloses a directory in the *cache*. Office Action, item 15, at page 6.

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Withdrawal of the rejections under 35 U.S.C. § 103 is respectfully requested.

The Rejections Under 35 U.S.C. §102 Are Accommodated or Rendered Moot

The Office Action rejects claims 105 – 110 under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 5,790,130 to Gannett (Gannett). Office Action, items 16 – 22, at pages 6 - 8. Applicants respectfully traverse the rejections for the reason that Gannett fails to disclose all recited features.

Applicants respectfully submit that claim 105 contains patentable subject matter for at least the reason that Gannett fails to disclose the feature of “determining whether a second plurality of texel values can fit into one half of the cache memory,” and combinations thereof, as recited in amended claim 105.

Claims 106 – 108 contain patentable subject matter for at least the reason that they depend from allowable claim 105.

Applicants have cancelled claims 109 and 110 for the sole purpose of advancing prosecution in this case, and reserve the right to argue the merits of those claims in future prosecution. Such cancellation renders the rejection as to those claims moot.

Withdrawal of the rejections under 35 U.S.C. § 102 is respectfully requested.

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CONCLUSION

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections, and that they be withdrawn. The Examiner is invited to telephone the undersigned representative if an interview might be useful to place the application in better condition for allowance.

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Respectfully submitted,
COOLEY GODWARD LLP

Cooley Godward LLP
Attn: Patent Group
One Freedom Square - Reston Town Center
11951 Freedom Drive
Reston, VA 20190-5656
Tel: (703) 456-8000
Fax: (703) 456-8100

By:

SA R. Olsen
Steven R. Olsen
Reg. No. 48,174

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3NK@011.DOC